

TRINITY MANUFACTURING, INC.

RECORD RETENTION POLICY

I. Purpose, Scope and Organization.

This Record Retention Policy (the "Policy") defines Trinity's (the "Company's") procedures for the retention and destruction of business records. It has been formulated in accordance with the following policy statement:

Records will be retained for as long as necessary to conduct ordinary business activities, or as required by law. When these needs or requirements have been met, records shall be destroyed.

This Policy applies to all records and to all personnel. As used in this Policy, "record" means any document, image, or other stored information, physical or electronic, which is created, developed, or received in the course of business.

This Policy consists of three documents:

- (1) This *Record Retention Policy*, which describes the Policy and its implementation.
- (2) *Appendix A: Record Retention Schedule* (the "Retention Schedule"), which lists retention periods for specified records.
- (3) *Appendix B: Record Review Committee* (the "RRC"), which lists the members of the Record Review Committee.

II. Formulation and Oversight.

This Policy and its accompanying Retention Schedule have been reviewed and approved by Company business, financial, regulatory and human-resources management, and by legal counsel.

The Record Review Committee, as approved annually by the Board of Directors, is responsible for (1) implementing the Policy; (2) reviewing and amending the Policy in accordance with business needs and legal, regulatory, accounting, or other requirements; (3) making final determinations regarding particular records; and (4) implementing litigation holds as may be required by this Policy or as may be directed by legal counsel.

III. Record Retention and Destruction.

Scheduled Records. All records scheduled for retention under Appendix A ("Scheduled Records") shall be retained for the applicable retention period. Where multiple retention periods are applicable to a given record, the longest applicable period shall be used. Correspondence and internal memoranda pertaining to Scheduled Records shall be retained for the same period as the records they pertain to or support. Scheduled Records which have exceeded their retention period and are no longer reasonably necessary for business purposes shall be destroyed.

Non-Scheduled Records. Records not scheduled for retention under Appendix A ("Non-Scheduled Records") shall be retained for so long as is reasonably necessary for business purposes. Retention of Non-Scheduled Records beyond two (2) years is presumed unnecessary absent legitimate reasons justifying retention. Employees have an ongoing duty to monitor the documents that they retain to be sure that they are keeping only those documents that are reasonably necessary for business purposes. Routine emails and correspondence that are not reasonably necessary for business purposes should be deleted on an ongoing basis and at least on a monthly basis. The two-year period set forth in this paragraph is intended to be the outside limit of retention and most non-scheduled documents should be deleted well before the end of the two-year period.

Biannual Record Review Meetings. On or about January 15 and June 1 of each year, the RRC shall conduct a record review meeting at which the RRC shall: (1) identify Scheduled Records which have exceeded the applicable retention period, and Non-Scheduled Records over two years old; (2) review these records as necessary to identify records requiring continued retention; and (3) arrange for the destruction of records which are no longer needed.

Litigation Hold. In the event of Litigation, as defined below, the destruction or deletion of any records relating to such Litigation shall be suspended until such time as the resumption of record destruction pursuant to this Policy is authorized by legal counsel. "Litigation" shall include any ongoing, pending or reasonably anticipated judicial or administrative proceeding or investigation involving the Company.

Internal Audits. In order to ensure compliance with and to identify opportunities to improve this Policy, the RRC shall periodically inspect retained records and storage locations.

Lost or Damaged Records. If Scheduled Records subject to this Policy are accidentally lost, damaged, or destroyed, or are incomplete or materially inaccurate, the RRC shall direct the re-creation or replacement of such records to the extent reasonably possible.

IV. Employee Responsibilities.

All employees are responsible for compliance with this Policy, for communicating with management regarding concerns with this Policy or with particular records, and for the destruction of records that have exceeded their retention period and are no longer reasonably necessary for business purposes.

Employees who become aware of an actual or reasonably foreseeable complaint, lawsuit, action, or investigation involving the Company must, even if no formal litigation hold has been issued, (1) immediately take steps to conserve potential evidence and (2) notify management or legal counsel.

Employees are reminded that records generated or stored on Company property and computers, including email, photographs and other documents, are considered Company property subject to company review and/or production in the event of litigation or regulatory or administrative investigation.

Appendix A: Record Retention Schedule

Record Type	Retention Period In Years <i>From date record finalized, except as noted</i>
ACCOUNTING	
Auditors' reports	Permanent
Accounts Payable (inc Ledgers)	7
Accounts Receivable (inc Ledgers)	7
Banking (inc deposits, checks, statements & reconciliations)	7
Cash Disbursement Ledgers	7
Cash Receipts Journal	7
Budget (inc Workpapers) One Year Plans	Current Year +1
Budget (inc Workpapers) Five Year Plans	Current Year +5
Credit Card Statements and Charge Slips	7
Credit Applications	1
Fixed Assets inc Depreciation records	Permanent
Expense reports	7
Financial Reports – Annual	10
Financial Statements	10
Financial Statements , Certified or Reviewed	10
General Ledger (inc Journal s)	7
Inventory lists	7
Investments – Sales/Purchases	Permanent
Invoices (inc Debit and Credit Memos)	7
Petty cash vouchers	7
Purchase Orders	7
Sales Invoices	7
Subsidiary ledgers (accounts receivable, accounts payable, etc.)	7
Registers	7
Uncollected Accounts	7
CORPORATE	
Annual reports	Permanent
Authorizations and appropriations for expenditures	7
Contracts, generally	Expiration + 7
Contracts, government	Expiration + 7
Contracts, sales (UCC)	7
Corporate governance (articles of incorporation, bylaws, resolutions, minutes of meetings, stock ownership records, etc.)	Permanent
TRANSPORTATION/SHIPPING	
Bills of Lading	7
Export Declarations	2

Record Type	Retention Period In Years <i>From date record finalized, except as noted</i>
INSURANCE	
Accident reports	7
Insurance policies	Permanent
LEGAL	
Claims and litigation files	Permanent
PAYROLL	
Earnings records (W-2, W-4, 1099s, etc.)	7
Garnishments	7
Time cards/sheets	7
Year-end payroll summary reports	7
PERSONNEL	
Applications for employment	1 <i>Successful applicants: Employment term + 7</i>
Attendance Records	3
Badge Lists	Active
Benefit plan files	7
COBRA files	Date applicant notified of decision + 8
Disability Records	Permanent
Disciplinary records	Employment term + 7
Employee Benefits	7
Employee Manuals	Permanent
Employee Medical Records	Term of Employment + 30 Years
Employee Relocation Records	7
Employment contracts	Expiration + 3
EEO Records	Permanent
Form I-9	Employment term + 3
Government compliance reports (IRS Form 5500, etc.)	7
Incentive Plans	7
Job Descriptions	Permanent
Pension records, including service, eligibility, personal information, pensions paid	Permanent
Pre-Employment Records (job applications, résumés, advertising)	1
Profit-sharing plan records	7
Service Records	Permanent
Visitor Registration	1
Worker's Compensation records	30
PRODUCTION	
Quality Control Reports	Permanent
Warehouse Inventory Records	7
REAL ESTATE	
Leases	Permanent

Record Type	Retention Period In Years <i>From date record finalized, except as noted</i>
Deeds	Permanent
Mortgages	Permanent
REGULATORY	
Adverse Effects Reports	30
Establishment Reports	Permanent
Fumigant Labels	Permanent
Product Registration Files	Permanent
Toxics Release Inventories	Permanent
RESEARCH AND DEVELOPMENT	
Studies, reports, data sets	Permanent
SAFETY	
Accident Reports	7
Audiometric Tests	Employment term + 30
Emergency Action Plans	Current
Environmental Monitoring and Testing Records	7
Material Safety Data Sheets	30
Medical or exposure to toxic substances records	Employment term + 30
OSHA Form 300	7
OSHA Log	7
Safety Records	7
Safety training records	Employment term + 7
SALES	
Orders	3
Proposals/Quotations	Actual +1
TAXES	
Income tax returns and cancelled checks (federal/state/local)	7
Payroll tax returns	7
Property tax returns	7
R&D tax credit filings	7
Sales and use tax returns	7

Appendix B: Record Review Committee

2013 MEMBERSHIP:

Vic Perreault, Chief Operating Officer

Carla James, Controller

David Rose, VP Operations

John Maultsby, Human Resources Manager

Scott Davenport, Information Technology Manager

Angela Hynum, VP Matrix Outsourcing

Jonathan Miller, Trical Group Counsel



EMPLOYEE ACKNOWLEDGMENT

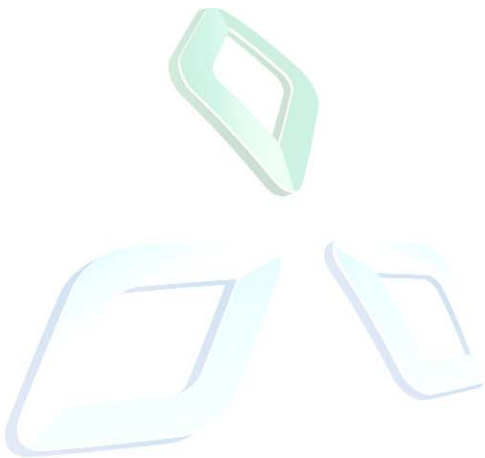
I HAVE RECEIVED, READ AND AGREE TO COMPLY WITH TRINITY 'S DOCUMENT RETENTION POLICY.

Signed: _____

Date: _____

Print Name: _____

Title: _____



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